

SALLY J. ELKINGTON - SBN 142619
JAMES A. SHEPHERD - SBN 264400
ELKINGTON SHEPHERD LLP
Historic Tribune Tower
409 - 13th Street, 10th Floor,
Oakland, CA 94612
tel (510) 465-0404
fax (510) 465-0202
email: jim@elkshep.com

Attorneys for Creditor-Lienholder
W. BRADLEY ELECTRIC, INC.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

PG&E CORPORATION, INC,
Debtor in Possession.

Chapter 11

Case No. 19-30088 (DM)
(Lead Case)

In re

PACIFIC GAS AND ELECTRIC
COMPANY,
Debtor in Possession.

(Jointly Administered)

**NOTICE OF CONTINUED
PERFECTION OF MECHANICS
LIENS UNDER 11 U.S.C. § 546(b)(2);
CERTIFICATE OF SERVICE**

☐ Affects PG&E Corporation

☒ Affects Pacific Gas and Electric
Company

☐ Affects both Debtors

* All papers shall be filed in the Lead
Case, No. 19-30088 (DM)

NOTICE IS HEREBY GIVEN that W. BRADLEY ELECTRIC, INC. ("WBE"),
a sub-contractor under certain pre-petition subcontracts (collectively, the "WBE Subcontracts")
with Roebbelen Contracting, Inc., Seegert Construction and CB2 Builders, Inc., respectively,
which entities are or were general contractors under certain related general contract agreements
with Pacific Gas and Electric Company ("PG&E"), including but not limited to PG&E's
agreements with the respective referenced general contractors as specified in Schedule G in this
case [Docket No. 907], as such subcontracts and general contracts may have been amended and

1 restated or otherwise modified or supplemented from time to time. Under the WBE
2 Subcontracts, WBE provided certain electrical, HVAC, architectural support and engineering,
3 design, survey, sitework, interior upgrades related services at PG&E facilities and properties
4 throughout Northern California (collectively, the “Properties”) to the benefit of PG&E. Under
5 certain of the WBE Subcontracts, in accordance with California law WBE had filed mechanics
6 liens attaching to the Properties as of January 29, 2019, PG&E’s Chapter 11 petition filing date.

7 Pursuant to California Civil Code § 8460, an action to enforce a mechanics lien must be
8 commenced within 90 days after recordation of the claim of lien. However, due to the automatic
9 stay herein, WBE is precluded from filing a state court action to enforce its liens. Under 11
10 U.S.C. § 546(b)(2), when applicable law requires seizure of property or commencement of an
11 action to perfect, maintain or continue the perfection of an interest in property, and the property
12 has not been seized or an action has not been commenced before the bankruptcy petition date,
13 the claimant shall instead file a notice in bankruptcy court within the time fixed by law for
14 seizing the property or commencing an action. 11 U.S.C. § 546(b)(2); see also In re Baldwin
15 Builders, 232 B.R. 406, 410-411 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101
16 Cal.App. 4th 26, 41 (2002).

17 Under California Civ. Code §§ 8050(a) and 8412, WBE is entitled to assert and hereby
18 does assert its lien rights and under 11 U.S.C. § 546(b) and gives this Notice in lieu of the
19 commencement of any action to perfect, maintain or continue WBE’s liens. WBE requests
20 adequate protection of said liens. True and correct copies of each of WBE’s liens, recorded and
21 filed against the Properties in each respective California county, are attached hereto as
22 EXHIBIT A and further identified therein as Exhibit A-1 thru Exhibit A-12, together with a
23 summary of said liens. The outstanding amount due under these 12 liened projects currently
24 totals not less than \$319,813.03 (altogether, the “WBE Liens”).

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1 WHEREFORE, WBE asserts secured interests in the Properties as reflected by the WBE
2 Liens to the fullest extent allowed by applicable law, including interest and attorneys' fees.
3 Further, WBE reserves all rights to supplement and/or amend this Notice, and reserves any and
4 all other rights under applicable law.

5 DATED: April 24, 2019

ELKINGTON SHEPHERD LLP

6 By: /s/ James A. Shepherd
7 Attorneys for Creditor-Lienholder
W. BRADLEY ELECTRIC, INC.

8 **CERTIFICATE OF SERVICE**

9 I, James A. Shepherd, state that I am over the age of eighteen years and not a party to the
10 within action; that my business address is Elkington Shepherd LLP, 409 - 13th Street, 10th
Floor, Oakland, CA 94612; and that on the date below, I caused to be served a true copy of the
within court-filed

11 **NOTICE OF CONTINUED PERFECTION OF MECHANICS**
12 **LIENS UNDER 11 U.S.C. § 546(b)(2); CERTIFICATE OF SERVICE (including**
13 **Exhibit A thereto),**

14 electronically through the court's ECF system on parties entitled to electronic notice in this case
in accordance with applicable law.

15 Executed at Walnut Creek, California on April 24, 2019. I declare under penalty of
16 perjury under the laws of the United States that the foregoing is true and correct.

17 /s/ James A. Shepherd
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